

other states by establishing an unduly low affordable rate.³⁷ Moreover, a nationwide approach is entirely consistent with, if not compelled by, the Act's requirement that rates in high cost rural areas be "reasonably comparable to rates charged for similar services in urban areas." 47 U.S.C. § 254(b)(3) (emphasis added). Indeed, providing different subsidies to service providers that have identical costs and provide identical services would contradict Congress's intent that universal service support be provided in a nondiscriminatory and competitively neutral manner.³⁸

³⁷ See Connecticut Office of Consumer Counsel v. AT&T Communications, 4 FCC Rcd. 8130, 8132 (1989), aff'd sub nom. Connecticut Office of Consumer Counsel v. FCC, 915 F.2d 75 (2d Cir. 1990), cert. den., 499 U.S. 920 (1991) (surcharge collected by AT&T to recover expense of gross receipts tax was a "reasonable method of preventing states from singling out telecommunications for taxation in order to transfer a portion of their tax burden to non-residents via rates for interstate telephone service"). Of course, as AT&T explained in its comments (at 14-15), a state would be free to provide additional subsidies to LECs beyond federal universal service support if such subsidies were funded by intrastate purchasers and not ratepayers in other jurisdictions.

³⁸ Proposals from commenters, such as SWBT, that the affordable rate be set on the basis of median household income fail to satisfy these standards. Presumably, this would require the Commission to determine the median household income in every region in which a cost estimate is used to determine the TSLRIC of the local exchange network. In any such region where the TSLRIC exceeds the arbitrarily designated percentage of median income, a local exchange provider would be eligible for universal service support. Thus, even within a single state there would be widely varying levels of universal service support.

Such a scheme on its face fails to comport with the Act's requirement of "reasonably comparable" rates. Moreover, because of factors like home ownership, median income is not necessarily a good proxy for income available for telephone service.

In addition, as AT&T demonstrated in its comments, the baseline for calculating a national affordable rate should certainly be no lower than the current national average charge for local phone service, increased by the amount of any implicit economic universal service subsidies currently embedded in access charges, such as the interstate CCLC. See AT&T at 15-17.

Low-Income Support. There is similarly broad agreement that the existing Lifeline and Link-Up programs should be consolidated with the other universal service-related subsidies. Given the Act's requirements that all funding for universal service support be explicit and nondiscriminatory, the commenters generally recognize that these programs can easily be continued, with funding, however, provided from the NUSF.³⁹

Schools, Libraries and Health Care. The final issue concerns subsidies to schools, libraries and health care providers. In its initial comments, AT&T endorsed the Act's approach of requiring telecommunications service providers to give discounts to qualified public institutions to enhance their access to advanced telecommunications services. AT&T at 19-20. However, as AT&T and many other commenters noted, the text and history of the Act limit these subsidies to "telecommunications services," and do not encompass premises equipment or inside wire

³⁹ See, e.g., BellSouth 10-13; Frontier at 3-5; Wisconsin PSC at 12-13; Pacific Telesis at 22-23; Oregon and Washington ITAs at 6.

upgrades.⁴⁰ Such a limitation is also supported by sound public policy: as U S WEST noted in its comments, the "larger the 'menu' of services for which USF support is required, the greater the pressure to increase the overall size of the USF" and, moreover, "as the menu gets larger, less discounting can reasonably be expected to occur." U S WEST at 20. Subsidizing purchases of premises equipment and inside wiring upgrades could threaten universal service because end users must ultimately bear the burden of these subsidies.

In its comments, moreover, AT&T demonstrated that the simplest and most equitable subsidy scheme would be to require that qualified public institutions be charged -- and providers allowed to recover -- only the "deepest volume discount level that is offered by the carrier for similar service to a commercial user." AT&T at 20. A number of other commenters offer constructive and complementary proposals that could serve as alternatives, or be used in conjunction with AT&T's proposal.⁴¹

For example, NYNEX proposes that the Commission establish a council with members from the public and private sectors to develop and evaluate proposals to enhance public

⁴⁰ See, e.g., Cincinnati Bell at 14; Citizens Util. at 20-21; Frontier at 4-5; ACTA at 9-10; U S WEST at 20-22; NYNEX at 18-19; BellSouth at 17; Ameritech at 15.

⁴¹ See, e.g., Ameritech at 14-18; Bell Atlantic at 17; BellSouth at 19-21; MCI at 20-21; NCTA at 17-19; NYNEX at 19-23; Pacific Telesis at 5-9.

institutions' access to information services.⁴² On the other hand, BellSouth proposes that the Commission give institutions a kind of "block grant" that could be applied to telecommunications services.⁴³

Given the undeveloped state of the record on this issue, AT&T recommends that the Joint Board continue to study it. At the same time, telecommunications services providers should be encouraged to work with State authorities and expand the numerous voluntary programs already offered to these institutions. For example, AT&T is involved in a number of ways to support life-long learning and access to new and emerging technologies for education. It has backed that support with over \$500 million in grants to educational institutions and professionals over the last decade. In addition, in 1995, AT&T announced its most significant single commitment to education -- the AT&T Learning Network -- a \$150 million, five-year commitment to help to put all 110,000 of the Nation's public and private elementary schools on the information superhighway by the year 2000. Such voluntary programs will work well until the Joint Board completes its study.

⁴² NYNEX at 20.

⁴³ BellSouth at 19-20.

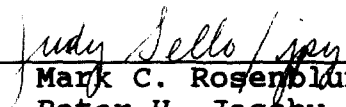
CONCLUSION

For the reasons stated above, the Commission should adopt a competitively neutral system of universal service support that supports the development of local competition, as mandated by the 1996 Act.

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Alliance for Distance Education in California

Alliance for Public Technology

Allied Associated Partners, LP and Geld Information
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America's Carriers Telecommunication Association ("ACTA")

American Association of Community Colleges

American Association of Retired Persons, Consumer
Federation of America, and Consumers Union
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American College of Nurse Practitioners

American Federation of Teachers

American Foundation for the Blind

American Hospital Association, Association of Academic
Health Centers, Association of American Medical
Colleges, National Rural Health Association

American Library Association

American Telemedicine Association

Ameritech

AMSC Subsidiary Corporation

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Association of America's Public Television Stations

Association of the Bar of the City of New York

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Cheyenne River Sioux Telephone Authority, et al.

Churchill County Telephone & Telegraph

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Citizens Utilities Company ("Citizens Util.")

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Colorado Public Utilities Commission

Commercial Internet Exchange Association

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Commissioners

Commonwealth of the Northern Marianas Islands

Commonwealth of the Northern Marianas

Communications Workers of America

Competitive Telecommunications Association ("CompTel")

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COMSAT Corporation, COMSAT International Communications

Continental Cablevision, Inc.

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Council of the Great City School

Council on Competitiveness

Early Childhood Development Center Legislative Coalition

Edgemont Neighborhood Coalition

Educom

Evans Telephone Company, et al.

Farmers Telephone Cooperative

Federation of American Research Networks

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Florida Public Service Commission ("Florida PSC")

Florida Telecommunications Association

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Fred Williamson & Associates, Inc.
Frederick & Warinner, L.L.C.
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General Communication, Inc.
General Services Administration ("GSA")
Georgia Public Service Commission
Governor of Guam
GTE Service Corporation ("GTE")
Guam Public Utility Commission
Guam Telephone Authority
GVNM Inc./Management
Harris, Skrivan & Associates, LLC
Hart Engineers
High Plains Rural Network
Hispanic Information and Telecommuciations Network, Inc.
Hopper Telecommunications Company
ICORE, Inc. (Adams Telephone Cooperative, et al.)
Idaho Public Utilities Commission
Illinois Commerce Commission
Illinois State Board of Education, et al.
Independent Cable & Telecommunications Association
Indiana Utility Regulatory Commission
Information Industry Association
Information Renaissance
Information Technology Association of America
and Electronic Messaging Association ("ITAA")
Information Technology Industry Council ("ITIC")

Instructional Telecommunications Council

Interactive Services Association ("ISA")

International Communciations Association ("ICA")

Iowa Communications Network

Iowa Telephone Association

Iowa Utilities Board

ITCs, Inc.

John Staurulakis, Inc.

Kentucky Department for Libraries & Archives

Kentucky Public Service Commission

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Kinko's, Inc.

LCI International Telecom Corp. ("LCI")

LDDS Worldcom ("LDDS")

Library of Michigan

Lincoln Trail Libraries System

LINCT Coalition

Louisiana Public Service Commission

Maine Public Utilities Commission, Montana Public Service Commission, Nebraska Public Service Commission, New Hampshire Public Utilities Commission, New Mexico State Corporation Commission, Utah Public Service Commission, Vermont Department of Public Service and Public Service Board, and Public Service Commission of West Virginia (collectively, "Maine PUC")

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Mendocino Unified School District

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Metricom, Inc.

MFS Communications Company, Inc. ("MFS")

Michigan Consumer Federation, et al.

Michigan Library Association

Michigan Public Service Commission

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("Minnesota Indep. Coal.")

Minnesota Telephone Association
("Minnesota Telephone Assoc.")

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Missouri State Library

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Mon-Cre Telephone Cooperative

Montana Hospital Association

Montana Independent Telecommunications Systems, Inc.

Montana Public Service Commission

Montana Telephone Association

Mountaineer Doctor TeleVision

National Association for the Advancement of Colored People

National Association of Development Organizations

National Association of Regulatory Utility
Commissioners ("NARUC")

National Association of State Utility Consumer Advocates

National Black Caucus of State Legislators

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National Council of La Raza, Southern Christian Leadership
Conference, Korean Youth and Community Center, Filipino
Civil Rights Advocates, Filipinos for Affirmative
Action, Association of Mexican-American Educators,
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Education, Chicano Federation of San Diego-County, El
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Committee for Civil Rights of the San Francisco Bay Area

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National Exchange Carrier Association, Inc. ("NECA")

National Indian Telecommunications Institute

National Retail Federation

National Rural Electric Cooperative Association

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National Urban League

Navajo Nation Washington Office

Nebraska Association of Hospitals and Health Systems

Nebraska Public Service Commission

Nebraska Rural Development Commission

Netscape Communications Corporation

New Hope Telephone Cooperative

New Jersey Board of Public Utilities

New Jersey Department of the Treasury, Ratepayer Advocate

New Mexico Attorney General

New York State Board of Regents and State Education
Department

New York State Consumer Protection Board

New York State Department of Public Service
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North Dakota Public Service Commission

North of Boston Library Exchange, Inc.

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Oakland Unified School District

Office of Communication of United Church of Christ,
Alliance for Community Media, and Minority Media &
Telecommunications Council

Office of Policy Analysis and Development

Office of Rural Health Policy

Office of the Ohio Consumers' Counsel

Office of the People's Counsel

Ohio Public Utilities Commission

Oklahoma Corporation Commission

Oklahoma Department of Libraries

OMB Watch

OpTel, Inc.

Oregon Independent Telephone Association,
Washington Independent Telephone Association
("Oregon and Washington ITAs")

Oregon Public Utility Commission

Pacific Telecom, Inc.

Pacific Telesis Group ("Pacific Telesis")

Park Region Mutual Telephone Co.

Pennsylvania Public Utility Commission
("Pennsylvania PUC")

Pennsylvania Rural Development Council

Pennsylvania Telephone Association

People for the American Way, Alliance for Community Media,
Alliance For Communications Democracy, Benton
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People of the State of California and
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Personal Communications Industry Association ("PCIA")

Public Utility Commission of Texas

Public Utility Law Project of New York, Inc.

Puerto Rico Telephone Company

Ragland Telephone Company

Reed Smith Shaw & McClay

Rhode Island Public Utilities Commission

Rock Port Telephone Company

Rural Iowa Independent Telephone Association

Rural Telephone Coalition ("Rural Tel. Coal.")
(NRTA, NTCA, OPASTCO)

Rural Telephone Finance Cooperative

Rural Utilities Service ("Rural Util. Serv.")

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Sailor (A Maryland Library Project)

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("South Carolina PSC")

South Dakota Public Utilities Commission

South Dakota Technology and Innovations in
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Southern New England Telephone Company

Southwest Montana Telepsychiatry Network

Southwestern Bell Telephone Company ("SWBT")

Sprint Corporation ("Sprint")

STAR Program

State of Alaska

State of South Dakota

State of Wisconsin

Superintendent of Public Instruction

Syracuse University

TCA, Inc.

Tele-Communications, Inc. ("Tele-Commun.")

Telec Consulting Resources, Inc.

Telecommunications Industry Association

Telecommunications Resellers Association
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Telefónica Larga Distancia De Puerto Rico, Inc.

Teleport Communications Group, Inc. ("Teleport")

Texas Advisory Commission on State Emergency
Communications

Texas Department of Information Resources

Texas Office of Public Utility Counsel

Time Warner Communications Holdings, Inc. ("Time Warner")

Tomlinson, Gary

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U S WEST, Inc. ("U S WEST")

U.S. Distance Learning Association

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United States Department of Education

United States Department of the Interior

United States National Commission on Libraries and Information Science

United States Small Business Administration ("SBA")

United States Telephone Association ("USTA")

University of Arizona

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Virginia's Rural Telephone Companies

Warren Library Association

Washington State Library

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WavePhore, Inc.

West Virginia Consumer Advocate

Western Alliance

Western Wireless Corporation ("Western Wireless")

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Winnebago Cooperative Telephone Association

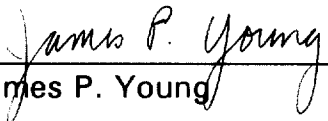
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I, James P. Young, hereby certify, that on this 7th day of May, 1996,
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